

EXHIBIT A

Re: Violation of the Court's Order Granting Defs' Motion to Proceed Under Pseudonym

Joseph McBride <jmcbride@mcbridelawnyc.com>

Wed 11/15/2023 6:28 PM

To: Dani Pinter <dpinter@ncoselaw.org>

Cc: Thomas Maniotis <tamaniotis@equitylegal.net>; cwaugh@waugh.legal <cwaugh@waugh.legal>; Christen Price <cprice@ncoselaw.org>; jennifer.safstrom@vanderbilt.edu <jennifer.safstrom@vanderbilt.edu>; Mary Norberg <MNorberg@waugh.legal>; Paul Ingrassia <paul@mcbridelawnyc.com>; jroth@laffeybuccikent.com <jroth@laffeybuccikent.com>; Peter Gentala <pgentala@ncoselaw.org>

Dear Dani Pinter,

We are all very tired of your cringe messages.

Sincerely,

On Wed, Nov 15, 2023 at 5:42 PM Dani Pinter <dpinter@ncoselaw.org> wrote:
Good Afternoon Mr. Maniotis,

I am writing to you today regarding your recent filings and public channels which conflict with the Court's order regarding confidentiality. On September 19, 2023, the Court issued its order requiring pseudonymity for the Defendants in light of threats to their safety. The Court held: "Plaintiffs' Motion to Proceed Under Pseudonym [DE 29] is GRANTED," required the Clerk of Court "to change the styling of the case and previous case filings in accordance with this ruling," and permitted "Defendants to proceed as Jane Doe, John Doe, June Doe, Mary Doe, and Liam Doe."

In your responses filed on October 24th, **there are several instances in which you used our client's real name**, which is in violation of the Order to Proceed Under Pseudonym filed on September 20th. In your response to Liam Doe, June Doe, and John Doe, you use Jane Doe's real name below the line, in the last page of the Google Drive document. See Pls' Resp. in Opp. to Liam Doe, June Doe, and John Doe, at 13, n.9. In your response to Jane Doe, you use Jane Doe's real name at the beginning of page 9 of the document. See Pls' Resp. in Opp. to Jane Doe, at 9. **These filings were all submitted after the Court's order and contradict the requirement to use pseudonyms for all Defendants.**

Additionally, you have not yet removed the [Complaint](#) and [press release](#) from your firm's website, and both your firm's and your own personal social media accounts, despite the court having granted the Defendants' Motion to Proceed Under Pseudonym almost two months ago. Moreover, you shared the Complaint displaying Defendants' names on a [September 8, 2023 livestream](#) you participated in with Walker Weekes and Myron Gaines on their YouTube Channel entitled "FreshandFit" (@FreshFitMiami) which has 1.5 million subscribers and the Complaint remains available there in unredacted form. These materials use our clients' names and are irreconcilable with the Court's order on pseudonymity.

Please refile the documents listed above in accordance with the Court's Order [DE 29], or request redaction or sealing from the clerk, and remove the documents not in compliance with the Court's order wherever you have made them available to the public by COB Friday (Nov. 17) or we will file a motion to compel and seek sanctions.

Sincerely,

Dani Bianculli Pinter

Senior Legal Counsel I National Center on Sexual Exploitation

1201 F St NW, Suite 200, Washington, DC 20004

e: dpinter@ncoselaw.org

w: EndSexualExploitation.org

--

Joseph D. McBride, Esq.
THE MCBRIDE LAW FIRM, PLLC
99 Park Avenue
6th Floor
New York, NY 10016
p: (917) 757-9537
e: jmcbride@mcbridelawnyc.com
w: www.mcbridelawnyc.com